

Every year, huge numbers of migratory birds die from flying into communication towers. Workers report finding the ground littered with hundreds, even thousands of dead songbirds. Many of the species these birds represent are already under pressure from habitat loss in their breeding areas. Massive mortality from collisions with towers is severely disruptive to the flight patterns, breeding, and feeding habits of these birds and to the fitness of the species, as these collisions do not discriminate between the healthy and the unfit.

The migratory patterns of birds are instinctive and deeply ingrained, and they cannot change them at will -- but humans can change where and what kind of towers they build. Accordingly, I am requesting that the FCC:

- 1) begin a systematic review of communication tower and bird mortality issues;
  - 2) institute a research program, funded by the communications industry, to identify tower placement, design and lighting conditions that result in bird mortality;
  - 3) undertake environmental reviews of all existing towers to assess their placement and design with regard to migratory bird impacts;
  - 4) require that all proposed towers be subjected to rigorous environmental reviews;
  - 5) and implement immediate protections based on existing knowledge, such as the voluntary tower siting and placement guidelines developed by the U.S. Fish and Wildlife Service.
- Thank you for your attention.